

Environmental Health Program (EHP)
Regulatory Operations and Enforcement Branch, Health Canada
391 York Ave
Winnipeg, MB
R3C 0P4

October 07, 2020

Shelly Boss
Project Manager
Impact Assessment Agency of Canada
Prairie and Northern Region
Suite 1145, 9700 Jasper Ave
Edmonton, AB
T5J 4C3

Subject: Health Canada's Response to the Determination of Impact Assessment Requirement for the Great Sandhills Railway Switching Operation at North West Terminal Project

Dear Shelly Boss,

Thank you for your letter dated September 21, 2020 requesting Health Canada's comments on the Initial Project Description provided by Great Sandhills Railway (GSR) for the proposed Switching Operation at North West Terminal Project.

Health Canada participates in the impact assessment process as a federal authority under the *Impact Assessment Act* (IAA). Health Canada makes available specialist or expert information or knowledge in its possession, at the request of the Impact Assessment Agency of Canada (the Agency).

The objective and scope of Health Canada's review of the initial Project Description is to verify that the potential health impacts of a project are properly identified for the purpose of determining whether a federal impact assessment is required. Health Canada has reviewed the initial Project Description and provided input, where appropriate, in the attached Federal Authority Advice Record. Should the Agency determine that an impact assessment is required for the Project, Health Canada can provide expertise on issues that are addressed within its departmental mandate.



Health
Canada

Santé
Canada

Should you have any questions concerning Health Canada's response, please contact Joel Kaushansky (Joel.Kaushansky@canada.ca).

Sincerely,

<Original signed by>

Matthew Gale

A/ Regional Manager, Environmental Health Program, Prairie Region

Regulatory Operations and Enforcement Branch

Health Canada

Phone #: (204) 295-6574

cc:

Chantal Roberge	Director, Environmental Health and Internationally Protected Persons Programs, Regulatory Operations & Enforcement Branch, Health Canada
Kathleen Buset	A/Director, Chemical and Environmental Health Management Bureau, Healthy Environments and Consumer Safety Branch, Health Canada
Kitty Ma	A/ Regional Manager, Environmental Health Program, ON Region, Health Canada
Aurelia Thevenot	A/Senior Environmental Health Specialist, Health Canada

Attachment: Federal Authority Advice Record: Authority and Summary of Issues
Great Sandhills Railway Switching Operation at North West Terminal Project – Agency File:
005770 / Registry Number: 80998
October 15, 2020

ATTACHMENT:

Federal Authority Advice Record
Response due by October 15, 2020

Great Sandhills Railway Switching Operation at North West Terminal Project

Agency File: 005770

Registry Number: 80998

Department/Agency	Health Canada
Lead IA Contact	Matthew Gale
Full Address	Stanley Knowles Building 391 York Ave Winnipeg, MB R3C 0P4
Email	hc.ia-ei.sc@canada.ca
Telephone	(204) 295-6574
Alternate Departmental Contact	Joel Kaushansky joel.kaushansky@canada.ca (343) 550-6213

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1. Is it probable that your department or agency may be required to exercise a power or perform a duty or function related to the Project to enable it to proceed?

If yes, specify the Act of Parliament and that power, duty or function.

Not applicable

2. Is your department or agency in possession of specialist or expert information or knowledge that may be relevant to the conduct of an impact assessment of the Project?

Specify as appropriate.

As a Federal Authority, Health Canada will provide specialist or expert information and knowledge in the Department's possession (expertise) to support the assessment of potential impacts on human health from projects considered individually and cumulatively under the *Impact Assessment Act* (IAA). The Department provides expertise in the areas described below; it does not play a regulatory role. How the expertise provided by Health Canada will be used in the Impact Assessment (IA) process will ultimately be determined by the reviewing body(ies). It should also be noted that expertise related to assessing human health that is relevant to IAs may be held by other federal, provincial and municipal partners, reflecting the shared jurisdiction for environmental and human health within Canada.

To support the implementation of the IAA, Health Canada can provide expertise in the following areas, as they relate to human health:



- Air quality
- Recreational and drinking water quality
- Traditional foods (Country Foods)
- Noise
- Human Health Risk Assessment (HHRA) methodology
- Health Impact Assessment (HIA) methodology
- Public health emergency management of toxic exposure events

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3. Has your department or agency considered the Project; exercised a power or performed a duty or function under any Act of Parliament in relation to the Project; or taken any course of action that would allow the Project to proceed in whole or in part?

Specify as appropriate.

No

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4. Has your department or agency had previous contact or involvement with the proponent or other party in relation to the Project? (for example, enquiry about methodology, guidance, or data; introduction to the project)

Provide an overview of the information or advice exchanged.

No

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5. Does your department or agency have additional information or knowledge not specified, above?

Specify as appropriate.

Health Canada has published the following guidance documents for evaluating human health impacts:

[Guidance for Evaluating Human Health Impacts in Environmental Assessment:](#)

- [Human Health Risk Assessment](#)
- [Air Quality](#)
- [Water Quality](#)
- [Country Foods](#)
- [Noise](#)
- [Radiological Impacts](#)

Guidance prepared by Health Canada on the management of crude oil incidents is available as a PDF through the following link:

- [Guidance for the environmental public health management of crude oil incidents: a guide intended for public health and emergency management practitioners](#)

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6. From the perspective of the mandate and area(s) of expertise of your department or agency, what are the issues that should be addressed in the impact assessment of the Project, should the Agency determine that an impact assessment is required?

For each issue discussed, provide a concise, plain-language summary that is appropriate for inclusion in the Summary of Issues.

Based on the limited information provided in the initial Project Description (iPD) by Great Sandhill Railway (the Proponent), Health Canada has identified the following key issues and information requirements that are likely to be relevant to the Great Sandhills Railway Switching Operation at North West Terminal Project (the Project). These are not to be construed as an exhaustive list of information requirements pertaining to human health for the Project.

[Human Health Setting](#)

Key issue: A more complete description of the human health setting, including potential human receptors and possible interactions with key components of the Project, would be required to understand potential impacts and risks.

In order to assess potential risks to human health, it is necessary to identify locations of potential human receptors, including residences, cabins and temporary/seasonal traditional use sites such as hunting, fishing, trapping, berry picking, and ceremonial or other uses (e.g. recreational) within the Project area. Sensitive human receptor locations, such as schools, hospitals, retirement complexes or assisted care homes, should also be included. Additionally, the distances between human receptor locations and the key components of the Project that may have potential impacts on these receptors should be identified. All relevant contaminants and exposure pathways should be considered when identifying potential receptors.

Health Canada also notes that the information provided does not identify which Indigenous groups or receptors may potentially be affected by this Project.

Air Quality

Key Issue: Ambient air quality may be affected by exhaust emissions from machinery and equipment, fugitive dust, and fuel combustion by-products during construction, operation and decommissioning.

The iPD does not identify specific air emission, but Health Canada notes that the proposed rail terminal expansion project, and associated activities, may release a variety of pollutants into the air during all project phases that may subsequently impact human health. Health Canada is of the opinion that the most stringent ambient air quality standards¹ or objectives should be used to assess existing (baseline) and predicted future (project, project + baseline, cumulative) air quality (e.g., for nitrogen dioxide (NO₂), sulphur dioxide (SO₂), fine particulate matter (PM_{2.5}), and ozone). If the equipment used during the Project's construction and operation phases require the use of diesel fuel, the health effects of diesel exhaust, including diesel particulate matter (DPM), should also be assessed.

Noise

Key Issue: Noise levels may increase due to various activities related to both Project operations and construction. Health effects on human receptors may vary based on the timing of project activities and the distance between the Project and human receptor sites (e.g. permanent residence).

The iPD does not describe potential effects on ambient noise. The detailed project description should contain a complete description of project activities, the timing of construction and operational activities, and the potential for noise emissions from those activities that may impact human health. Particular attention will need to be given to the potential for sleep disturbance among residents residing near the Project area. As well, human receptors in rural areas may have a greater expectation of "peace and quiet".

Emergencies, Accidents & Spills

Key Issue: Depending on the products being handled on-site, contaminants of potential concern (COPCs) may be released to the environment in the event of accidents or malfunctions.

Emergency service and spill management were referenced in the iPD without describing specific contaminants of potential concern (COPC) or information on the management of toxic exposure events, should they occur. The detailed project description should consider the risks to human health from potential emergencies, accidents and spills.

¹ The Canadian Ambient Air Quality Standards (CAAQS) consider nitrogen dioxide, fine particulates and ozone to be "non-threshold" air pollutants; meaning that health effects may occur at any level of exposure to these air pollutants.



Differential impacts to vulnerable groups

Key Issue: Disaggregated information on human health-relevant factors is required to support Gender Based Analysis Plus (GBA+) and analysis of health impacts.

Information on how the Project may differentially impact diverse groups of people is lacking, including with respect to health-relevant factors. Disaggregated information is required to conduct GBA+ and understand the differential health impact of the project on women, children and other vulnerable groups, including from a cumulative effects perspective.

Matthew Gale <Original signed by>

Name of Departmental / Agency
Responder

A/Regional Manager,
Environmental Health Programs

Title of Responder

October 7, 2020

Date